

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

JANE DOE,

Plaintiff,

v.

Case No. 3:23-cv-00018-RSB

RECTOR AND VISITORS OF THE  
UNIVERSITY OF VIRGINIA,

Defendant.

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**DEFENDANT’S OBJECTIONS TO PLAINTIFF’S SECOND SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Now comes Defendant, the Rector and Visitors of the University of Virginia, by counsel, and provides the following objections to Plaintiff Jane Doe’s (“Plaintiff” or “Doe”) Second Set of Interrogatories and Requests for Production to Defendant.

**INTERROGATORIES**

**INTERROGATORY NO. 6:**

Please identify every person who may have knowledge of the following allegations included in Defendant’s August 16, 2024 letter to Counsel for Plaintiff, including but not limited to the third party referenced and/or the individual(s) with whom the photograph(s) and/or video were shared:

In Plaintiff’s response to Request for Production Number 3 she stated that no responsive documents are known to her. We have discovered through a third party that your client likely shared a photograph or photographs and/or video regarding an interaction with Gabriel Finder over a social networking site such as WhatsApp. Any photograph, video, and/or message that Plaintiff shared or sent

over WhatsApp or any other social networking site relating to the allegations in the Amended Complaint are responsive and must be produced.

**OBJECTION:**

**Defendant objects to Interrogatory Number 6 because it is untimely under the Scheduling Order. ECF No. 30. The Scheduling Order requires “that all written discovery be served in sufficient time to allow a response before the cutoff date for discovery.” ECF No. 30 at 4. The cutoff date for discovery in this matter was September 10, 2024. Plaintiff served this discovery request on Defendant on August 22, 2024, which did not allow sufficient time for a response before September 10, 2024.**

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 13:**

Please produce all documents and/or communications related to Plaintiff’s Interrogatory No. 6.

**OBJECTION:**

**Defendant objects to Request for Production Number 13 because it is untimely under the Scheduling Order. ECF No. 30. The Scheduling Order requires “that all written discovery be served in sufficient time to allow a response before the cutoff date for discovery.” ECF No. 30 at 4. The cutoff date for discovery in this matter was September 10, 2024. Plaintiff served this discovery request on Defendant on August 22, 2024, which did not allow sufficient time for a response before September 10, 2024.**

Respectfully submitted,

**THE RECTOR AND VISTORS OF THE  
UNIVERSITY OF VIRGINIA**

By Counsel: /s/ Christopher P. Bernhardt  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of September of 2024, a true and accurate copy of the foregoing document was sent by electronic mail to Plaintiff's counsel:

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dmunro@trialsva.com

Elizabeth Abdnour  
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